



Co-Chairperson: Jim McKenna, Port of Portland
Co-Chairperson: Bob Wyatt, NW Natural
Treasurer: Fred Wolf, Legacy Site Services for Arkema

April 3, 2008

Chip Humphrey
Eric Blischke
805 SW Broadway
Suite 500
Portland, OR 97205

Re: LWG Response to EPA's March 10, 2008 email requesting chemical analysis of lamprey ammocoetes (Lower Willamette River, Portland Harbor Superfund Site, USEPA Docket No: CERCLA-10-2001-0240)

Dear Chip and Eric;

The LWG is responding to email from Eric Blischke on March 10, 2008, requesting chemical analysis of the lamprey ammocoetes for the water toxicity test chemicals. The request stated "(m)asuring tissue body burdens from the water toxicity testing will provide us with an estimate of the relative sensitivity of the lamprey ammocoetes based on another line of evidence - tissue-residue TRVs." The request went on to say that "there is good TRV information for most of the chemicals tested (i.e., lindane, copper, pentachlorophenol and diazinon)." This poses two concerns for the LWG:

1. EPA is asking the LWG to add a new line of evidence (LOE) to the lamprey risk assessment, and
2. This statement assumes that suitable tissue-residue TRVs exist for these specific chemicals (i.e. lindane, naphthalene, copper, diazinon, pentachlorophenol, and aniline) against which to compare lamprey tissue TRVs.

In order to support adding a new LOE to the lamprey risk assessment, the following three issues would need to be considered:

1. There is in fact "good (tissue residue) TRV information" available for the six specific chemicals tested;
2. The tissue residue TRVs for these chemicals are for the same exposure pathway (i.e., water-only exposure) as was tested in the lamprey bioassay program to be consistent with how other fish TRVs are derived; and

3. The tissue residue TRVs are not calculated by multiplying LCx values by bioconcentration factors.

Upon resolving the above-mentioned issues with EPA the LWG would take under consideration the broader question of whether to add another LOE to the lamprey risk assessment per the March 10, 2008, request.

We look forward to discussing this matter with you and your team.

Sincerely,



Jim McKenna
LWG Co-Chair



Bob Wyatt
LWG Co-Chair

cc:

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